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Via Electronic Filing

The Honorable Lois Bloom, U.S.M.J.
U.S. District Court Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Singh v. Lintech Electric, Inc. et al*
Case No.: 1:18-cv-05780-FB-LB

Dear Honorable Magistrate Judge Bloom:

This law firm represents Defendants Lintech Electric, Inc. (the “Company”), and Linden J. Tudor (“Mr. Tudor”), and together with the Company, the “Defendants”) in the above-referenced action.

Pursuant to Your Honor’s Individual Motion Practice Rules 1(A) and Your Honor’s September 8, 2021 Order, this letter respectfully serves to provide the Court with an update regarding the status of remaining discovery.

Prior to the October 29, 2020 Order, staying all discovery pending a resolution of Defendants’ Motion for Sanctions, the parties were in the process of scheduling Plaintiff’s continued deposition, and the continued deposition of Defendants’ Fed.R.Civ.P. 30(b)(6) witness. [See Dckt. No. 88].

Defendants propose that the depositions occur on or before November 26, 2021.

Prior to, and following Plaintiff’s deposition, Defendants’ intend to propound supplemental document requests, interrogatories and requests for admissions.

Thus, Defendants propose a global fact discovery deadline of December 24, 2021.

The undersigned law firm conferred with Plaintiff’s counsel in preparing a joint statement, prior to the filing of the instant letter. However, as of the time of this filing, the undersigned law firm has not heard back from Plaintiff’s counsel regrading his final comments to the schedule proposed above, presumably in light of the Jewish High Holiday of Yom Kippur.

It is the undersigned’s understanding that Plaintiff’s counsel wishes to take Defendants’ Fed.R.Civ.P. 30(b)(6) witness’ deposition, and also intends to propound post-deposition supplemental document requests, interrogatories and requests for admissions.

Out of an abundance of caution, the undersigned wanted to file the instant letter pursuant to Your Honor’s September 8, 2021 Order.

Thank you, in advance, for your time and attention.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

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